

**REMARKS**

By this amendment, Applicants propose rewriting claims 28, 30, and 34 in independent form to include the recitations of each claim's base and any intervening claims, and propose amending claims 21 and 35 to more appropriately define Applicants' invention. Claims 21-36 are pending in the application.

Applicants thank the Examiner for the courtesies extended to Applicants' representative during a telephone interview held on January 6, 2004. During the interview, the Examiner and Applicants' representative discussing independent claims 21 and 35 and the applied references Strandberg (U.S. Patent No. 6,054,999) and Watt et al. ("Advanced Animation and Rendering Techniques").

In the Final Office Action mailed October 7, 2003, the Examiner rejected claims 21-27, 29, 35, and 36 under 35 U.S.C. § 103(a) as unpatentable over Strandberg in view of Watt and rejected claims 31-33 under 35 U.S.C. § 103(a) as unpatentable over Strandberg in view of Tsuga et al. (U.S. Patent No. 5,895,124).

In addition, the Examiner objected to claims 28, 30, and 34 as being dependent upon a rejected base claim, but deemed these claims allowable if rewritten in independent form to include all elements of each claim's base claim and any intervening claims. Applicants propose rewriting claims 28, 30, and 34 in independent form including all of the recitations of each claim's base claim and any intervening claims. Accordingly, Applicants respectfully request that the Examiner allow claims 28, 30, and 34.

Applicants respectfully traverse the rejection of claims 21-27, 29, 35, and 36 under 35 U.S.C. § 103(a) as unpatentable over Strandberg in view of Watt for at least the following reasons.

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As proposed by this amendment, claim 21 recites a combination of elements including, among other things, "viewpoint determining means for determining a position of the viewpoint for capturing the image containing the object, wherein the viewpoint corresponds to a virtual camera that captures motion of the object, and wherein the position of the viewpoint is determined continuously in real-time based on a player's operation" (emphasis added). Neither Strandberg nor Watt, taken alone or combination, disclose or suggest at least these features.

Strandberg discloses producing a graphic movement sequence for a cartoon figure by compiling a recording of measured data from strategic parts of an actor. See Abstract. In that regard, Strandberg describes "mark[ing]" an actor with motion points and generating "key drawings." (Strandberg, col. 11, l. 31-col. 12, l. 5.) Strandberg generates a sufficient number of key drawings to visually represent "the whole spectrum of movement." However, Strandberg does not disclose or suggest "viewpoint determining means for determining a position of the viewpoint for capturing the image containing the object, wherein the viewpoint corresponds to a virtual camera that captures motion of the object, and wherein the position of the viewpoint is determined continuously in real-time based on a player's operation," as recited in proposed amended claim 21 (emphasis added).

Furthermore, Watt fails to cure the deficiencies of Strandberg. Watt merely discloses that "[a] virtual camera is often used as a conceptual aid in computer graphics." See p. 7. Therefore, Strandberg and Watt, taken alone or in combination, fail to teach or suggest claim 21. The Examiner should thus withdraw the rejection of claim 21 under 35 U.S.C. § 103(a).

Claims 22-27 and 29 depend either directly or indirectly from claim 21.

Applicants also propose amending claim 35 to include recitations similar to those of proposed claim 21. Claim 36 depends from claim 35. Therefore, for at least the reasons given above with respect to claim 21, the Examiner should also withdraw the rejection of claims 22-27, 29 and 35-36 under 35 U.S.C. § 103(a).

Applicants respectfully traverse the rejection of claims 31-33 as unpatentable over Strandberg in view of Tsuga for at least the following reasons.

Claims 31-33 depend from claim 21 and include all the elements therein including "viewpoint determining means for determining a position of the viewpoint for capturing the image containing the object, wherein the viewpoint corresponds to a virtual camera that captures motion of the object, and wherein the position of the viewpoint is determined continuously in real-time based on a player's operation." For at least the reasons given above, Strandberg fails to teach this element. Although Tsuga discloses an optical disc reproduction device, Tsuga fails to cure the deficiencies of Strandberg. Claims 31-33 are thus patentable over Strandberg and Tsuga, whether taken alone or in any reasonable combination. Therefore, the Examiner should withdraw the rejection of claims 31-33 under 35 U.S.C. §103(a).

### **CONCLUSION**

In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Applicant respectfully requests that the Examiner enter this Amendment under 37 C.F.R. § 1.116, placing claims 21-36 in condition for allowance. Applicants submit that the proposed amendments of claims 21, 28, 30, 34, and 35 do not raise new issues

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or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants submit that the claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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